

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHANNAN ELLIS, RICH FREIBERG,
CHRISTOPHER ROY, and STEPHEN
RIES, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

HUB INTERNATIONAL LIMITED,

Defendant.

Master File No. 1:23-cv-06137

Hon. John J. Tharp Jr.

**PLAINTIFFS' UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Under Federal Rule of Civil Procedure 23(e), Plaintiffs Shannan Ellis, Rich Freiberg, Christopher Roy, and Stephen Ries (collectively, "Plaintiffs"), respectfully move this Court, pursuant to Federal Rule of Civil Procedure 23, for an Order: (i) granting final approval of the proposed Settlement; (ii) certifying the Settlement Class for purposes of Settlement; and (iii) entering Judgment and dismissing all claims. Plaintiffs consulted with Defendant before filing this Motion and it is unopposed.

This Motion is based on (i) the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and its exhibits (filed concurrently herewith); (ii) all prior pleadings and proceedings had herein; (iii) arguments of counsel; and (iv) any other matters properly before the Court.

For the reasons described in Plaintiffs' Memorandum of Law in support of this Motion, Plaintiffs respectfully request that this Court grant the Motion and enter the proposed Order.

Dated: September 15, 2025

By: /s/ Raina C. Borrelli
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CERTIFICATE OF SERVICE

I, Raina C. Borrelli, hereby certify that on September 15, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record, below, via the ECF system.

DATED this 15th day of September, 2025.

STRAUSS BORRELLI PLLC

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